

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

Alonzo Austin, )  
                    )  
Plaintiff,       )  
                    )  
v.                 ) Civil Action No.  
                    )  
Global Connection, Inc. of America, Sam ) 3:07-CV-042-MEF  
Abdallah, Rachelle Copeland and Global )  
Connection, Inc. of Alabama,         )  
                    )  
Defendants.       )

**ANSWER**

COMES NOW, Defendants Global Connection, Inc. of America, Sam Abdallah, Rachelle Copeland and Global Connection, Inc. of Alabama and file this their Answer to Plaintiff's Complaint and show as follows:

1.

Defendants deny the allegations contained in Paragraph 1 of Plaintiff's Complaint.

2.

Defendants deny the allegations contained in Paragraph 2 of Plaintiff's Complaint.

3.

Defendants deny the allegations contained in Paragraph 3 of Plaintiff's Complaint.

4.

Defendants deny the allegations contained in Paragraph 4 of Plaintiff's Complaint.

5.

Defendants deny the allegations contained in Paragraph 5 of Plaintiff's Complaint.

6.

Defendants deny the allegations contained in Paragraph 6 of Plaintiff's Complaint.

7.

Defendants deny the allegations contained in Paragraph 7 of Plaintiff's Complaint.

8.

Defendants deny the allegations contained in Paragraph 8 of Plaintiff's Complaint.

9.

Defendants deny the allegations contained in Paragraph 9 of Plaintiff's Complaint.

10.

Defendants Sam Abdallah and Rachelle Copeland are not proper parties to this action as they have had no contractual relationship with the Plaintiff and are merely officers of the other named corporate Defendants. As such Defendants Sam Abdallah and Rachelle Copeland should be dismissed from this action.

11.

Defendants reserve the right to plead other and further affirmative defenses as discovery proceeds.

This 17th day of August, 2007.

MCKOON, THOMAS & MCKOON

*/s/ Joshua R. McKoon*

By: \_\_\_\_\_

Joshua R. McKoon  
State Bar No. MCK057

925 Broad Street  
P.O. Box 3220  
Phenix City, Alabama 36868-3220  
334.297.2300

**CERTIFICATE OF SERVICE**

Counsel for the Defendant has this day served the foregoing Response on the Plaintiff via First Class Mail at the following address:

Alonzo Austin  
1321 Oliver Carus Road  
Tuskegee, Alabama 36083

This 17<sup>th</sup> day of August, 2007.

*/s/Joshua R. McKoon*

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Counsel for Defendant